

BLANKROME

300 Carnegie Center | Suite 220 | Princeton, NJ 08540

A Pennsylvania LLP | Stephen M. Orlofsky, New Jersey Administrative Partner

blankrome.com

Phone: (609) 750-2641

Fax: (609) 897-7282

Email: mblanco@blankrome.com

December 14, 2018

VIA ECF

Honorable Susan D. Wigenton
United States District Judge
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: United States v. William E. Baroni, Jr. and Bridget Anne Kelly,
Crim. No. 15-193 (SDW)

Dear Judge Wigenton:

Blank Rome LLP, along with Baldassare & Mara, LLC, represent Defendant, William Baroni, in the above matter. We submit this letter jointly with Michael Critchley, Jr., of Critchley, Kinum & DeNoia, LLC, who represents Defendant Bridget Anne Kelly. Pursuant to the Court's Order of September 17, 2018 (ECF No. 363), we write to provide a status update on the matter.

As Your Honor is probably aware, on November 27, 2018, the Court issued a precedential opinion affirming in part and reversing in part the judgments of conviction, vacating the sentences, and remanding the case to the district court for resentencing. For the reasons set forth in a motion to the Third Circuit of December 7, 2018, Mr. Baroni and Ms. Kelly requested and have been granted an extension of time until Friday, January 4, 2019, of the deadline to file a petition for panel rehearing and/or rehearing *en banc*.

Accordingly, because the sentences have been vacated and there is presently no sentence for the defendants to surrender to serve, we respectfully request that Your Honor enter an Order vacating the control dates for the surrender of Mr. Baroni and Ms. Kelly, and directing the defendants to file a status update on or before January 11, 2019. A proposed form of Order is attached.

Thank you for Your Honor's courtesies and consideration.

Respectfully submitted,

/s/ Mayling C. Blanco

Mayling C. Blanco

MCB

BLANKROME

Honorable Susan D. Wigenton, U.S.D.J.

December 14, 2018

Page 2

Encl.

cc: Lee M. Cortes, Jr., Asst. U.S. Attorney (w/ enc.) (via ECF)
Vikas Khanna, Asst. U.S. Attorney (w/ enc.) (via ECF)
David W. Feder, Asst. U.S. Attorney (w/ enc.) (via ECF)
Michael Baldassare, Esquire (w/ enc.) (via ECF)
Jennifer Mara, Esquire (w/ enc.) (via ECF)
Michael Critchley, Sr., Esquire (w/ enc.) (via ECF)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

v.

WILLIAM E. BARONI, JR., and BRIDGET
ANNE KELLY,

Defendants.

Hon. Susan D. Wigenton

Docket No.: Cr. 15-193 (SDW)

**ORDER VACATING SURRENDER
DATES AND SETTING STATUS
REPORTING DATE**

THIS MATTER having come before the Court upon the joint application of Blank Rome LLP and Baldassare & Mara, LLC, counsel for defendant William E. Baroni, Jr. (“Baroni”), and Critchley, Kinum & DeNoia, LLC, counsel for defendant Bridget Anne Kelly (“Kelly”); and this Court having granted bail pending appeal during Baroni and Kelly’s respective sentencing hearings; and this Court having ordered Baroni and Kelly to notify it if the appeals were still pending; and the defendants having advised the Court by letter dated December 14, 2018 of the decision of the Third Circuit and of the status of their respective appeal rights; and for good cause shown:

IT IS, on this _____ day of December, 2018,

ORDERED that the reporting dates for the voluntary surrenders of Baroni and Kelly are hereby vacated until re-sentencing; and

IT IS FURTHER ORDERED that Baroni and Kelly shall, on or before January 11, 2019, notify this Court of the status of their respective appeals right.

HONORABLE SUSAN D. WIGENTON
UNITED STATES DISTRICT JUDGE